

Exhibit 2

*Paramount Home Entertainment Inc.'s First Set of Request
for Production of Documents to Circuit City Stores, Inc., et al.*

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-and-

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Counsel for Claimant (Claim Nos. 1009, 9681)
PARAMOUNT HOME ENTERTAINMENT INC.

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

In re

CIRCUIT CITY STORES, INC., *et al.*,

Debtors.²

Case No.: 08-35653-KRH
(Jointly Administered)

Chapter 11

**PARAMOUNT HOME ENTERTAINMENT INC.'S
FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO
CIRCUIT CITY STORES, INC., ET AL.**

¹ Orders granting *pro hac vice* admission for Messrs. Stern and Tuchin and Ms. Elliott (f/k/a Korin A. Avelino) were entered by the Court on July 24, 2009. See Docket Nos. 4279, 4280, and 4281.

² The Debtors and the last four digits of their respective taxpayer identification numbers are as follows: Circuit City Stores, Inc. (3875), Circuit City Stores West Coast, Inc. (0785), InterTAN, Inc. (0875), Ventoux International, Inc. (1838), Circuit City Purchasing Company, LLC (5170), CC Aviation, LLC (0841), CC Distribution Company of Virginia, Inc. (2821), Circuit City Properties, LLC (3353), Kinzer Technology, LLC (2157), Abbott Advertising Agency, Inc. (4659), Patapsco Designs, Inc. (6796), Sky Venture Corp. (0311), Prahs, Inc. (n/a), XSSstuff, LLC (9263), Mayland MN, LLC (6116), Courchevel, LLC (n/a), Orbyx Electronics, LLC (3360), and Circuit City Stores PR, LLC (5512).

**TO: CIRCUIT CITY STORES, INC., AND ITS CHAPTER 11 AFFILIATES IN
THE ABOVE-CAPTIONED CASES (COLLECTIVELY, THE “DEBTORS”)**

Pursuant to Fed. R. Civ. P. 34, applicable to this contested matter pursuant to Fed. R. Bankr. P. 7034 and 9014, Paramount Home Entertainment Inc. (“Paramount”) requests that you, the Debtors, produce the requested documents for inspection and copying.

Paramount requests that the Debtors produce the requested documents for inspection and photocopying at the offices of Klee, Tuchin, Bogdanoff & Stern LLP, 1999 Avenue of the Stars, 39th Floor, Los Angeles, California 90067, or at such other location to be mutually agreed upon.

Under Fed. R. Civ. P. 34(b)(3) and Fed. R. Bankr. P. 906(f), you are required to respond to these Requests for Production within 33 days after service of these requests. Your response must be signed as required by Fed. R. Civ. P. 26(g).

**I.
INSTRUCTIONS AND DEFINITIONS**

- A. You are required to produce all documents requested that are within your possession, custody, or control, or in the possession, custody, or control of your attorneys, investigators, accountants, agents, and/or other persons acting or purporting to act on your behalf, including any predecessors or successors.
- B. The documents shall be produced as they are kept in the usual course of business, or shall be organized and labeled to correspond to the paragraphs of these requests.

- C. If you maintain that any document that is requested herein is protected from disclosure by any privilege or protection, including (but not limited to) the attorney-client privilege or the work-product doctrine, specify the nature of the protection claimed, describe the precise ground for the protection, and identify the document with particularity, including its author, dates, all recipients thereof, the subject matter, and the number of pages therein.
- D. In the event that any document called for in these Requests has been destroyed, lost, discarded, or disposed of, any such document is to be identified as completely as possible, including, without limitation, the following information:
 - 1. the date of disposal;
 - 2. the manner of disposal;
 - 3. the reason for disposal;
 - 4. the person authorizing disposal; and
 - 5. the person disposing of the document.
- E. If a Request is deemed to call for disclosure of proprietary or confidential data, Paramount's counsel is prepared to receive such data pursuant to an appropriate protective order.
- F. In responding to these Requests, please refer to the following definitions:
 - 1. "Debtors," whether capitalized or not, whether referred to in the possessive or not, refers to Circuit City Stores, Inc., and its chapter 11 affiliates in the above-captioned cases.

2. “Document” has the meaning assigned to “writings and recordings” in Rule 1001(1) of the Federal Rules of Evidence and refers to those materials in the Debtors’ actual or constructive possession, custody or control, including (but not limited to) originals, copies, non-identical copies, and preliminary, intermediate, and final drafts of letters, words, or numbers, or their equivalent, set down by handwriting, typewriting, printing, photostating, photographing, magnetic impulse, mechanical or electronic recording, or other form of data compilation. As used herein, “Documents” includes email and other electronically stored information.

3. “Evidencing” shall mean referring to, mentioning, discussing, or establishing (either directly, inferentially, or presumptively) the fact or facts described in the particular discovery request.

4. “Petition Date,” whether capitalized or not, means November 10, 2008.

5. “Paramount Reclamation Demand” refers to the *Demand for Reclamation of Goods by Paramount Home Entertainment* served on November 12, 2008, in compliance with the Debtors’ reclamation procedures, in which Paramount demanded the return of the products delivered to and accepted by the Debtors while insolvent in the ordinary course of business within the 45-day period preceding the Petition Date, which products had a total value of \$11,600,840.04.


II.
REQUESTS FOR PRODUCTION

1. Produce every document that supports your responses to the Paramount Home Entertainment Inc. First Set of Interrogatories to Circuit City Inc., et al., served concurrently herewith.

DATED: November 23, 2009

KLEE, TUCHIN, BOGDANOFF & STERN LLP

By: _____


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CERTIFICATE OF SERVICE

I, Korin A. Elliott, hereby certify that a true and correct copy of the foregoing *Paramount Home Entertainment Inc.'s First Set of Requests for Production of Documents to Circuit City Stores, Inc., et al.* has been served upon the parties listed below via standard mail on this 23rd day of November, 2009.

/s/ Korin A. Elliott

Korin A. Elliott (kelliott@ktbslaw.com)

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